

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

Case No. 20-cv-01319 (JRT/HB)

This document relates to:

ALL CASES

**LR 7.1(f) WORD COUNT COMPLIANCE CERTIFICATE
REGARDING PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF
ITS MOTION TO COMPEL DOCUMENT CUSTODIANS**

I, Geoffrey H. Kozen, certify that Plaintiffs' Memorandum of Law in Support of its Motion to Compel Document Custodians complies with Local Rules 7.1(f).

I further certify that, in preparation of this memorandum, I used Microsoft Word, Version 2016, and that this word processing program has been applied specifically to include all text, including headings, footnotes, and quotations in the following word count. I further certify that the above-referenced memorandum contains 9,040 words.

I further certify that the foregoing motion complies with Local Rule 7.1(h) in that it is typewritten in size 13 font, double-spaced (except for headings, footnotes and quotations that exceed two lines) and utilizes 8 ½ X 11 inch margins.

Dated: February 25, 2022

Respectfully Submitted,

ROBINS KAPLAN LLP

/s/ Geoffrey H. Kozen

Geoffrey H. Kozen (Bar No. 0398626)
Thomas J. Undlin (Bar No. 0183751)
Stacey P. Slaughter (Bar No. 0296971)
K. Craig Wildfang (Bar No. 0117043)
Eric P. Barstad (Bar No. 0398979)
800 LaSalle Avenue
Suite 2800
Minneapolis, MN 55402
Tel: 612-349-8500
Fax: 612-339-4181
gkozen@robinskaplan.com
tundlin@robinskaplan.com
sslaughter@robinskaplan.com
kcwildfang@robinskaplan.com
ebarstad@robinskaplan.com

Liaison Counsel for the Cattle Plaintiffs

Christopher M. Burke (*pro hac vice*)

SCOTT+SCOTT

ATTORNEYS AT LAW LLP

600 W. Broadway, Suite 3300

San Diego, CA 92101

Tel.: 619-233-4565

Fax: 619-233-0508

cburke@scott-scott.com

David R. Scott (*pro hac vice*)

Amanda F. Lawrence (*pro hac vice*)

Patrick J. McGahan (*pro hac vice*)

Michael P. Srodoski (Bar No. 0398250)

SCOTT+SCOTT

ATTORNEYS AT LAW LLP

156 South Main Street
P.O. Box 192
Colchester, CT 06415
Tel.: 860-537-5537
Fax: 860-537-4432
david.scott@scott-scott.com
alawrence@scott-scott.com
pmcgahan@scott-scott.com
msrodoski@scott-scott.com

Anthony F. Fata (*pro hac vice*)
Jennifer W. Sprengel (*pro hac vice*)
Daniel O. Herrera
Kaitlin Naughton
**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**
135 South LaSalle St., Suite 3210
Chicago, IL 60603
Tel.: 312-782-4882
Fax: 312-782-4485
afata@caffertyclobes.com
jsprengel@caffertyclobes.com
dherrera@caffertyclobes.com
knaughton@caffertyclobes.com

Ellen Meriwether (*pro hac vice*)
**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**
205 N. Monroe St.
Media, PA 19063
Tel.: 215-864-2800
emeriwether@caffertyclobes.com

*Interim Co-Lead Counsel for the Cattle
Plaintiffs*

Michael L. Schrag (*pro hac vice*)
Joshua Bloomfield (*pro hac vice*)
George Sampson (*pro hac vice*)
Kyla Jenny Gibboney

GIBBS LAW GROUP LLP

505 14th Street, Suite 1110
Oakland, CA 94612
Tel: (510) 350-9700
mls@classlawgroup.com
jjb@classlawgroup.com
gws@classlawgroup.com
kjb@classlawgroup.com

David E. Kovel (*pro hac vice*)
Thomas W. Elrod (*pro hac vice*)
Karen M. Lerner (*pro hac vice*)
Anthony E. Maneiro (*pro hac vice*)

KIRBY McINERNEY LLP

250 Park Avenue, Suite 820
New York, NY 10177
Tel: (212) 371-6600
dkovel@kmlp.com
telrod@kmlp.com
klerner@kmlp.com
amaneiro@kmlp.com

Richard M. Paul III (*pro hac vice*)
Sean Cooper (*pro hac vice forthcoming*)

PAUL LLP

601 Walnut Street, Suite 300
Kansas City, Missouri 64106
Tel: (816) 984-8100
Rick@PaulLLP.com
Sean@PaulLLP.com

Melissa S. Weiner (Bar No. 0387900)
PEARSON, SIMON & WARSHAW, LLP
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
Tel: (612) 389-0600
mweiner@pswlaw.com

Bruce L. Simon (*pro hac vice*)
PEARSON, SIMON & WARSHAW, LLP

44 Montgomery Street, Suite 2450
San Francisco, CA 94104
Tel: (415) 433-9000
bsimon@pswlaw.com

Daniel L. Warshaw (*pro hac vice*)
Bobby Pouya (*pro hac vice*)
Matthew A. Pearson (*pro hac vice*)
PEARSON, SIMON & WARSHAW, LLP
15165 Ventura Blvd., Suite 400
Sherman Oaks, CA 91403
Tel: (818) 788-8300
dwarshaw@pswlaw.com
bpouya@pswlaw.com
mapearson@pswlaw.com

Plaintiffs' Executive Committee

/s/ Shana E. Scarlett
Shana E. Scarlett (*pro hac vice*)
Rio S. Pierce (*pro hac vice*)
**HAGENS BERMAN SOBOL SHAPIRO
LLP**
715 Hearst Avenue, Suite 202
Berkeley, California 94710
Tel: (510) 725-3000
Fax: (510) 725-3001
shanas@hbsslaw.com
riop@hbsslaw.com

Steve W. Berman (*pro hac vice*)
Breanna Van Engelen (*pro hac vice*)
**HAGENS BERMAN SOBOL SHAPIRO
LLP**
1301 Second Avenue, Suite 2000
Seattle, Washington 98101
Tel: (206) 623-7292
Fax: (206) 623-0594
steve@hbsslaw.com
breannav@hbsslaw.com

W. Joseph Bruckner (MN #0147758)
Brian D. Clark (MN #0390069)
Arielle S. Wagner (MN #0398332)
Kyle Pozan (*pro hac vice*)
R. David Hahn (MN #0401262)
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue South,
Suite 2200
Minneapolis, MN 55401
Tel: (612) 339-6900
Fax: (612) 339-0981
wjbruckner@locklaw.com
bdclark@locklaw.com
aswagner@locklaw.com
kjpozan@locklaw.com
rdhahn@locklaw.com

*Interim Co-Lead Class Counsel for
Plaintiffs in the Peterson Action*

/s/ Joshua J. Rissman
Daniel E. Gustafson (MN #202241)
Daniel C. Hedlund (MN #258337)
Michelle J. Looby (MN #0388166)
Joshua J. Rissman (MN #0391500)
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 Sixth Street, Suite 2600
Minneapolis, MN 55402
Tel: (612) 333-8844
Fax: (612) 339-6622
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
mlooby@gustafsongluek.com
jrissman@gustafsongluek.com

Dennis J. Stewart (*pro hac vice*)
GUSTAFSON GLUEK PLLC
600 B Street, 17th Floor
San Diego, CA 92101
Tel: (612) 333-8844
Fax: (612) 339-6622
dstewart@gustafsongluek.com

Adam J. Zapala (*pro hac vice*)
Elizabeth Tran Castillo (*pro hac vice*)
Reid W. Gaa (*pro hac vice*)
COTCHETT, PITRE & MCCARTHY, LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
azapala@cpmlegal.com
ecastillo@cpmlegal.com
rgaa@cpmlegal.com

Alexander E. Barnett (*pro hac vice*)
COTCHETT, PITRE & McCARTHY, LLP
40 Worth Street, 10th Floor
New York, NY 10013
Telephone: (212) 201-6820
Facsimile: (917) 398-7753
abarnett@cpmlegal.com

Jason S. Hartley (*pro hac vice*)
HARTLEY LLP
101 W. Broadway, Suite 820
San Diego, CA 92101
Tel: (619) 400-5822
hartley@hartleyllp.com

Megan E. Jones (*pro hac vice forthcoming*)
HAUSFELD LLP
600 Montgomery Street, Suite 3200
San Francisco, CA 94111
Tel: (415) 633-1908
mjones@hausfeld.com

*Interim Co-Lead Counsel for the Proposed
Direct Purchaser Plaintiffs*

/s/ Blaine Finley
Jonathan W. Cuneo (*pro hac vice*)
Blaine Finley (*pro hac vice*)
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Ave., NW, Suite 200
Washington, DC 20016
Tel: (202) 789-3960
jonc@cuneolaw.com
bfinley@cuneolaw.com

Shawn M. Raiter (MN #240424)
LARSON KING LLP
30 East Seventh Street, Suite 2800
Street Paul, MN 55101
Tel: (651) 312-6518
sraiter@larsonking.com

Don Barrett (*pro hac vice*)
Katherine Barrett Riley (*pro hac vice*)
David McMullan (*pro hac vice*)
Sterling Starns (*pro hac vice*)
BARRETT LAW GROUP, P.A.

P.O. Box 927
404 Court Square North
Lexington, Mississippi 39095-0927
Tel: (662) 834-9168
Fax: (662) 834-2628
donbarrettpa@gmail.com
kbriley@BarrettLawGroup.com
dmcmullan@BarrettLawGroup.com
sstarns@barrettlawgroup.com

*Counsel for Commercial and Institutional
Indirect Purchaser Plaintiff Erbert & Gerbert's,
Inc.*

Patrick J. Ahern (*pro hac vice*)
Theodore B. Bell (*pro hac vice*)
AHERN AND ASSOCIATES, P.C.
Willoughby Tower
8 South Michigan Avenue, Suite 3600
Chicago, Illinois 60603
Tel: (312) 404-3760
patrick.ahern@ahernandassociatespc.com
theo.bell@ahernandassociatespc.com

Patrick J. Lee-O'Halloran (#269074)
**THOMPSON TARASEK LEE-
O'HALLORAN PLLC**
7101 York Avenue South, Suite 255
Edina, MN 55435
Tel: (612) 568-0132
Fax: (612) 564-6976
patrick@ttlolaw.com

*Counsel for Plaintiffs Winn-Dixie Stores, Inc.,
and Bi-Lo Holding, LLC*